



CALIFORNIA EMERGENCY MANAGEMENT AGENCY

GRANTS MANAGEMENT MEMORANDUM

2009-15

DATE: October 29, 2009

TO: Emergency Management Performance Grant Subgrantees

FROM: Emergency Management Grants Section

RE: EMPG Program Updates - Environmental Planning and Historic Preservation Requirements for Grants

This Grant Management Memo (GMM) is intended to provide general guidance to subgrantees on the Environmental Planning and Historic Preservation (EHP) review process for the grant programs administered by the Grant Programs Directorate (GPD) at the Federal Emergency Management Agency (FEMA). This includes the Emergency Management Performance Grant (EMPG) program.

In particular, this Memo provides guidance for those programs that, from this point forward, will purchase certain equipment, hold exercises, or conduct training in the field. These projects have the potential to affect environmental resources and historic properties through ground disturbance; impact to wetlands, floodplains, coastal zones, and other water resources; alteration of historically significant properties; and impact to threatened and endangered species, migratory birds, and habitat. Consequently, FEMA engages in a compliance review process to ensure proposed projects comply with applicable Federal EHP laws, regulations, and Executive Orders.

Project Descriptions and EHP Review Process

Project descriptions are required to be submitted to your assigned regional coordinator prior to the initiation of the project. The regional coordinator will forward your project description to the Emergency Management Grant Section, who is responsible for submitting the package to FEMA's GPD. Preferred submission formats are those supported by Microsoft Office (.doc files) and Adobe Acrobat (.pdf files). JPEG is the preferred picture format, but other widely supported file types may be used.

Attached is an EHP Screening Memo to assist in the gathering of all pertinent information for an effective EHP review and instructions for preparing an aerial map of location. Below is the required information that should be included in your submission:

- Name of project, grant, and grantee;
- Grant award number and fiscal year;
- Overall purpose and estimated cost;
- Physical address of where the project will be implemented (street address, city, and state, or latitude and longitude coordinates)

- Visual documentation including but not limited to color site/structure photographs; plans/drawings that define the size and precise location of proposed work; U.S. Geological Survey topographic maps; FEMA Flood Insurance Rate Maps; U.S. Fish and Wildlife Service National Wetlands Inventory and U.S. Army Corps of Engineers approved wetland maps, if available; U.S. Department of Agriculture soil survey maps and color aerial photographs
- Project description should include as applicable:
 - Dimensions/acreage/square footage of structure and/or land affected, with height and structural support information for all communication towers
 - Extent and depth of ground disturbance for new construction and structure modification, including trenching for utility lines, installation of fencing and light posts, tower footings and pads, etc.
 - Best management practices to be used for erosion and sediment control
- Special elements of the project, including:
 - Special equipment that will be used, staging areas, access roads, easements, etc.
 - Extent of structural modification
- Year building/structure was built
- Information regarding features, resources, and potential adverse impacts at or near the project area, including:
 - Water bodies (rivers, lakes, streams, wetlands, etc.), floodplains, and coastal zone
 - Historic and cultural resources (historic districts, buildings, landscapes, bridges, piers, dams, archaeological sites, etc.)
 - Migratory birds, threatened and endangered species, and/or critical habitat
 - Vegetation, including general types of plants, trees, or lack thereof
 - Geologic features, including soil and topography
 - Tribal cultural and religious sites and special areas (forests, wildlife refuges, reserves, etc.)
 - Community facilities and services (e.g. churches, schools, hospitals, etc.)
 - Hazardous wastes, superfund site, etc. (<http://www.epa.gov/enviro/html/em/> or <http://www.epa.gov/myenvironmental>)
 - Any recent or relevant studies, reports, or surveys that were prepared for other agencies or purposes and provide information on environmental resources and/or historic properties in the project area
 - Any agency coordination documents regarding environmental and/or historic resources

Subgrantees are responsible for the preparation of documentation required to fulfill compliance responsibilities under Federal EHP laws; this documentation may include, but is not limited to site studies, biological assessments, archaeological surveys, environmental assessments, and environmental impact statements. Furthermore, they are also responsible for implementation of any mitigation measures required to address potential adverse impacts that may have been identified during the EHP review process. Costs associated with the preparation of these documents are allowable grant expenditures.

Timelines for the EHP review process will vary based on the complexity of the project and the potential for environmental or historical impacts. A project review may take 30 to 45 working days for those proposed activities with a potentially low environmental or historical impact. A project that has potential significant adverse impacts to EHP resources, such as new construction or installation of communication towers greater than 200 feet, may take up to one year to review. Based on the review of the project description, FEMA's Grant Preparedness Directorate may determine the need for additional evaluation and documentation. Inadequate project descriptions and/or documentation of the presence of environmental resources and historic properties in a project area may cause significant delays in the timeliness of the review and affect project implementation. During the project planning phase, please allot time for EHP reviews.

For your information, you will find that the Authorized Equipment List (AEL) has been updated to reflect those equipment purchases for which an EHP review may be required.

Failure of the subgrantee to meet all Federal, State, and local EHP requirements, to comply with project conditions established during the EHP review, and/or to obtain applicable permits and approvals may result in project delays or de-obligation of funds.

Subgrantees must receive written approval from FEMA prior to the use of grant funds for project implementation.

In addition to the screening memo, the following Web site may have useful information: www.fema.gov/plan/ehp. But if you have any further questions on the status of your EHP review packet, or for any questions related to the EHP review process, please contact the Emergency Management Grant Section at (916) 845-8139 or by email at yvonne.cantrell@oes.ca.gov.

Sincerely,



BRENDAN A. MURPHY
Director of Grants Management

Attachments:

Final Screening Memo
Picture Documentation Instructions

ENVIRONMENTAL and HISTORIC PRESERVATION SCREENING MEMO (EHPSM)

This memo should be attached to all project information sent to the Grant Programs Directorate (GPD) for an environmental and historic preservation (EHP) regulatory compliance review. Please complete sections A – D of this memo as applicable. When questions are not applicable to the project, please leave the field blank. This memo is intended to be completed electronically. Please contact GPD-EHP for a version of this memo that is suitable for printing and completing by hand.

A. PROJECT INFORMATION

Grant Program Name: _____ Grant Award Number: _____

- Project Type (*Check all that apply*): ☐ Physical security enhancements (i.e., installation of fencing, cameras, TWIC readers, bollards, motion detection systems, x-ray machines, lighting, etc.)
- ☐ New installation/construction/renovation (i.e., emergency operations centers, docks, piers, security guard buildings, etc.)
- ☐ Renovations/upgrades/modifications to structures 50 years old or older
- ☐ Communication towers, related equipment, and equipment shelters
- ☐ Other ground disturbing activities (i.e., trenching, excavation, etc.)
- ☐ Training and exercises
- ☐ Purchase of equipment (specify) _____
- ☐ Other (specify) _____

Grantee Name: _____

State: _____ County: _____ Agency: _____ Subgrantee: _____

Project Title: _____

Fiscal Year: _____

B. PROJECT DESCRIPTION/LOCATION (*The following information will be required in order to complete a review for each project type. If multiple "project types" describe the same project, [i.e., physical security enhancements AND renovations of structures 50 years old or older AND other ground disturbing activities], it is not necessary to repeat information; please make a note to refer back to the previous entry.*)

Project Type: ☐ **Physical security enhancements (i.e., installation of fencing, cameras, TWIC readers, bollards, motion detection systems, x-ray machines, lighting, etc.)**

Project Location (*physical project address or latitude/longitude of project location*): _____

Color site photos and other visual documentation (i.e., maps, technical drawings) attached? ☐ Yes ☐ No

Will ground disturbance be required? ☐ Yes ☐ No

If yes, please give total extent (*depth, length, and width*) _____

Has the ground been previously disturbed? ☐ Yes ☐ No

Please describe previous ground disturbing activities (e.g., parking lot, farming, commercial development, etc.): _____

Will any equipment or structures need to be installed? ☐ Yes ☐ No

If yes, please explain how and where this is proposed to be done (*please include site-specific photographs, and attach additional pages, if needed*): _____

Please state the date of construction of the building(s) or structure(s) (e.g., bridge) involved in the proposed project: _____

Project Type: ☐ **New installation/construction/renovation (i.e., emergency operations centers, docks, piers, security guard buildings, etc.)**

Project Location (*physical project address or latitude/longitude of project location*): _____

Color site photos and other visual documentation (i.e., maps, technical drawings) attached? ☐ Yes ☐ No

Will ground disturbance be required? ☐ Yes ☐ No

If yes, please give total extent (*depth and length*): _____

Has the ground been previously disturbed? ☐ Yes ☐ No

Please describe previous ground disturbing activities (e.g., parking lot, farming, commercial development, etc.): _____

Will any equipment or structures need to be installed? ☐ Yes ☐ No

If yes, please explain how and where this is proposed to be done (*please include site-specific photographs, and attach additional pages, if needed*): _____

Please state the date of construction of the building(s) or structure(s) (e.g., bridge) involved in the proposed project: _____

Project Type: ☐ **Renovations/upgrades/modifications to structures 50 years old or older**

Project Location (*physical project address or latitude/longitude of project location*): _____

Color site photos and other visual documentation (i.e., maps, technical drawings) attached? ☐ Yes ☐ No

Will ground disturbance be required? ☐ Yes ☐ No

If yes, please give total extent (*depth and length*): _____

Has the ground been previously disturbed? ☐ Yes ☐ No

Please describe previous ground disturbing activities (e.g., parking lot, farming, commercial development, etc.): _____

Will any equipment or structures need to be installed? ☐ Yes ☐ No

If yes, please explain how and where this is proposed to be done (*please include site-specific photographs, and attach additional pages, if needed*): _____

Please state the date of construction of the building(s) or structure(s) (e.g., bridge) involved in the proposed project: _____

Project Type: ☐ **Communication towers, related equipment, and equipment shelters**

Project Location (*physical project address or latitude/longitude of project location*): _____

Color site photos and other visual documentation (i.e., maps, technical drawings) attached? ☐ Yes ☐ No

Please state the total height (in ft.) of the tower or structure, including any antennae to be mounted: _____

If the proposed tower height is greater than 199 feet above ground level, please state why this is needed to meet the requirements of the project: _____

Will the tower be free-standing or require guy wires? ☐ Free standing ☐ Guy wires

If guy wires are required, please state how many: _____

Please state why a guyed tower is needed to meet the requirements of this project: _____

Has an FCC license been obtained for this tower? ☐ Yes ☐ No License #: _____

If yes, please attach all relevant environmental documentation submitted as part of the licensing process, including use of the Tower Construction Notification System (TCNS), if applicable.

Will ground disturbance be required? ☐ Yes ☐ No

If yes, please give total extent (*depth and length*): _____

Has the ground been previously disturbed? ☐ Yes ☐ No

Please describe previous ground disturbing activities (e.g., parking lot, farming, commercial development, etc.): _____

Will any equipment or structures need to be installed? ☐ Yes ☐ No

If yes, please explain how and where this is proposed to be done (*please include site-specific photographs, and attach additional pages, if needed*): _____

Please state the date of construction of the building(s) or structure(s) (e.g., bridge) involved in the proposed project: _____

Project Type: ☐ **Other ground disturbing activities (i.e., trenching, excavation, etc.)**

Project Location (*physical project address or latitude/longitude of project location*): _____

Color site photos and other visual documentation (i.e., maps, technical drawings) attached? ☐ Yes ☐ No

What type of ground disturbance is needed and why (*i.e., utility trenching, etc.*)? _____

Please give the total extent of ground disturbance required (*depth and length*): _____

Has the ground been previously disturbed? ☐ Yes ☐ No

Please describe previous ground disturbing activities (e.g., parking lot, farming, commercial development, etc.): _____

Will any equipment or structures need to be installed? ☐ Yes ☐ No

If yes, please explain how and where this is proposed to be done (*please include site-specific photographs, and attach additional pages, if needed*): _____

Please state the date of construction of the building(s) or structure(s) (e.g., bridge) involved in the proposed project: _____

Project Type: ☐ **Training and exercises**

Project Location (*physical project address or latitude/longitude of project location*): _____

Is the training field-based or classroom-based? ☐ Field-based ☐ Classroom-based

Will field-based training take place at an approved facility (i.e. existing facilities, with established and approved procedures, and that conform with existing land use designations)? ☐ Yes ☐ No

If training is classroom-based or taking place at an approved facility, no further information is required. If field-based and not at a previously approved facility, please provide the following:

Color site photos and other visual documentation (i.e., maps, technical drawings) attached? ☐ Yes ☐ No

Will ground disturbance be required to prepare the training site? ☐ Yes ☐ No

If yes, please give total extent (*depth and length*): _____

Has the ground been previously disturbed? ☐ Yes ☐ No

Please describe previous ground disturbing activities (e.g., parking lot, farming, commercial development, etc.): _____

Will any equipment or structures need to be installed to facilitate training? ☐ Yes ☐ No

If yes, please explain how and where this is proposed to be done (*please include site-specific photographs, and attach additional pages, if needed*): _____

Please describe the scope of the proposed training (purpose, frequency, facilities/location needed, materials and equipment needed, number of participants, and type of activities required) (*Attach additional pages, if needed*): _____

Does the training exercise differ in any way (frequency, amount of facilities/land used, materials or equipment used, number of participants, type of activities, etc.) from previously approved, permitted training exercises and training practices? ☐ Yes ☐ No

If yes, please explain any differences, and the reason for them, in detail (*Attach additional pages, if needed*): _____

Project Type: ☐ **Purchase of equipment (specify)** _____

Will any equipment need to be installed? ☐ Yes ☐ No

If yes, please explain how and where this is proposed to be done (*please include site-specific photographs, and attach additional pages, if needed*): _____

Please state the date of construction of the building(s) or structure(s) (e.g., bridge) involved in the proposed project: _____

Project Type: ☐ **Other (specify)** _____

Please provide a detailed project description, including where the project is proposed to take place, what steps it will consist of, and how its goals are proposed to be accomplished (*Attach additional pages, if needed*): _____

C. CONSIDERATION OF RESOURCE IMPACTS

The EHP review process will be greatly facilitated by comprehensive and detailed answers in this section. When completing this section, please state a specific reason [i.e., “there will be no impacts to geology and soils because this project will not involve any ground disturbance”] and cite a source [i.e., local master plan, previous environmental assessment, correspondence with US Fish and Wildlife Service, correspondence with State Historic Preservation Office, FEMA Floodplain Insurance Rate Map (FIRM), etc.] to support a response of “no impact” or “potential to impact.”

Identify potential impacts to the following resources	No Impact	Potential to Impact	Reason/ Data Source/Agency
Noise			
Air quality			
Water resources, including surface water, groundwater, wetlands, coastal areas, and floodplains			
Geology and soil resources, including prime and unique farmlands and hydric soils			
Biological resources, including general vegetation, wildlife, wildlife habitat, migratory birds, and wetland habitat			
Threatened and endangered species and critical habitat			
Cultural resources, including architectural resources, archaeological resources, and Traditional Cultural Properties			
Buildings or structures 50 years old or older			
Socioeconomic resources, including economic development, demographics, and demand for housing and public services			
Environmental justice			
Aesthetics and visual resources			
Human health and safety			
Infrastructure, utilities, transportation and waste mgt.			
Land use planning and zoning			
Hazardous waste/ contamination			
Community facilities and services			

D. OTHER INFORMATION *(Please answer the following questions/provide requested information.)*

Are personnel preparing this form familiar with the site? ☐ Yes ☐ No

Did personnel visit site? ☐ Yes ☐ No

Is the project part of an approved plan such as a Master Plan or an Implementation Plan or any larger action with an accompanying National Environmental Policy Act (NEPA) document? ☐ Yes ☐ No *(If yes, give the plan name, and please include a copy of the NEPA document)*

Is the project still consistent with the approved plan? ☐ Yes ☐ No

(If no, additional EHP compliance requirements may apply.)

Is the environmental document accurate and up-to-date? ☐ Yes ☐ No

(If no, additional EHP compliance requirements may apply.)

What was the decision of the NEPA document? *(Check one, and please attach):*

☐ Finding of No Significant Impact (FONSI) OR

☐ Record of Decision (ROD)

Date approved _____

PICTURE DOCUMENTATION INSTRUCTIONS

1. Obtain aerial photo; there are multiple online sources for aerial photos that are either free or request a nominal fee.
2. Copy the aerial image.
3. Open Microsoft Paint and paste the aerial image on the canvas. The image should now be in Microsoft Paint.
4. Using the paint resources such as line drawing and fill colors, label exactly where facility security enhancements will be installed i.e. fencing, lighting, cameras.
5. Cut and paste completed drawing into Word document and explain details of the facility security enhancements.
6. An example of a completed product is pasted below.



Applicant Name: X Bus Company

Grant Program: FY 2008 Intercity Bus Security Grant Program

Grant Number: 2008-XX-XX-0000

Project 2: Facility Security Enhancements was awarded to X Bus Company in January 2009. Above are the enhancements that we wish to make to our facility. The building that the camera is mounted on was built in 1980. The installation will include 6,412 linear feet of chain link security fencing. A total of 820 fence post holes 6" in diameter and 36" deep will be dug. The property is not located in a designated flood plain and the building is not a designated historical property or a designated wetland.